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Ultimate Fighting Championship and UFC

Additional Counsel Listed on Signature Page

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Lead Case No.: 2:15-cv-01045-RFB-
(PAL)

Member Case Nos.:

2:15-cv-01046-RFB-(PAL)

2:15-cv-01055-RFB-(PAL)

2:15-cv-01056-RFB-(PAL)

2:15-cv-01057-RFB-(PAL)

**STIPULATION TO FILE A
CONSOLIDATED COMPLAINT AND TO
EXTEND ZUFFA, LLC'S DEADLINE TO
ANSWER PLAINTIFFS'
CONSOLIDATED AMENDED
COMPLAINT ACCORDINGLY**

(First Request)

1 Luis Javier Vazquez and Dennis Lloyd
2 Hallman, on behalf of themselves and all
3 others similarly situated,

4 Plaintiffs,

5 v.

6 Zuffa, LLC, d/b/a Ultimate Fighting
7 Championship and UFC,

8 Defendant.

Case No. 2:15-cv-01055 RFB-(PAL)

9 Brandon Vera and Pablo Garza, on behalf of
10 themselves and all others similarly situated,

11 Plaintiffs,

12 v.

13 Zuffa, LLC, d/b/a Ultimate Fighting
14 Championship and UFC,

15 Defendant.

Case No. 2:15-cv-01056 RFB-(PAL)

16 Gabe Ruediger and Mac Danzig, on behalf of
17 themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 Zuffa, LLC, d/b/a Ultimate Fighting
21 Championship and UFC,

22 Defendant.

Case No. 2:15-cv-01057 RFB-(PAL)

23 Kyle Kingsbury and Darren Uyenoyama, on
24 behalf of themselves and all others similarly
25 situated,

26 Plaintiffs,

27 v.

28 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No. 2:15-cv-01046 RFB-(PAL)

STIPULATION

Plaintiffs, Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and Darren Uyenoyama, and Defendant Zuffa, LLC (collectively, “the Parties”) file this Stipulation To File A Consolidated Amended Complaint And To Extend Defendant Zuffa, LLC’s Deadline to Answer Plaintiffs’ Consolidated Amended Complaint Accordingly.

On September 25, 2015, the Court held a hearing on Zuffa’s Motions to Dismiss each of Plaintiffs’ five substantively identical complaints. On September 27, 2015, Minute Orders were entered denying Zuffa’s Motions to Dismiss each of Plaintiffs’ five complaints. *Le* Dkt. 186, *Vazquez* Dkt. 77, *Vera*, Dkt. 76, *Ruediger* Dkt. 52, *Kingsbury* Dkt. 48.

On October 12, 2015, the parties filed a Stipulation to Extend Defendant Zuffa, LLC’s Deadline To Answer Plaintiffs’ Complaints. (Dkt. 191.) At the November 17th Status Conference, the Court indicated it would grant the stipulation once a corrected image was filed in compliance with Local Rule 6. Because this stipulation renders moot Dkt. 191, the parties will withdraw Dkt. 191.

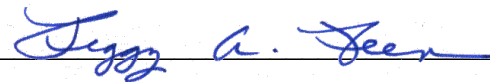
To promote efficiency, the parties further agree that within thirty (30) days of the entry of an Order approving this Stipulation by the Court, Plaintiffs may file a Consolidated Amended Complaint that consolidates each of the five complaints in *Le*, *Vazquez*, *Vera*, *Ruediger*, and *Kingsbury* into a single consolidated complaint. At this time, Plaintiffs do not seek leave to make substantive changes to the allegations in the proposed Consolidated Amended Complaint, but may reduce the total number of proposed representative plaintiffs.

The Parties further agree that Zuffa may have thirty (30) days from the filing of the Consolidated Amended Complaint to file a consolidated Answer to the Plaintiffs’ proposed Consolidated Amended Complaint. Accordingly, the parties request that the Court enter an Order approving the instant Stipulation To File A Consolidated Amended Complaint And To Extend Defendant Zuffa, LLC’s Deadline to Answer Plaintiffs’

1 Consolidated Amended Complaint Accordingly. The extension will not alter the date of
2 any event or deadline already fixed by Court order. This is the Plaintiffs' first request to
3 file a consolidated amended complaint and Zuffa's second request for an extension of
4 time with regard to its Answers.

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6
7
8 **ORDER**

9
10 IT IS SO ORDERED:

11
12 

13 Hon. Peggy A. Leen

14 UNITED STATES MAGISTRATE JUDGE

15
16 DATED: November 20, 2015

DATED: November 19, 2015

/s/ Michael Dell'Angelo

Michael Dell'Angelo

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Patrick Madden

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DATED: November 19, 2015

/s/ John F. Cove, Jr.

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ATTESTATION OF FILER

The signatories to this document are myself and Michael Dell'Angelo, and I have obtained Mr. Dell'Angelo's concurrence to file this document on his behalf.

Dated: November 19, 2015

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **STIPULATION TO FILE A CONSOLIDATED COMPLAINT AND TO EXTEND ZUFFA, LLC'S DEADLINE TO ANSWER PLAINTIFFS' CONSOLIDATED AMENDED COMPLAINT** **ACCORDINGLY** was served on November 19, 2015 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Suzanne Jaffe

An employee of Boies, Schiller & Flexner, LLP